

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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QATAR INVESTMENT & PROJECTS  
DEVELOPMENT HOLDING COMPANY W.L.L (QIPCO),

and

HIS HIGHNESS SHEIKH HAMAD BIN ABDULLAH BIN KHALIFA AL-THANI,

Plaintiffs,

v.

Case No. 17-CV-553

JOHN DOE  
a/k/a “The Muslim Issue”

Defendant.

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**DECLARATION OF RICHARD HART**

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Pursuant to 28 U.S.C. § 1746, I, Richard Hart, state and declare as follows:

1. I am an adult resident of London, England and an attorney with the law firm Pinsent Masons, LLP.

2. I am a close advisor to both of the above-named Plaintiffs and have personal knowledge of the matters set forth in this Declaration.

3. Portions of the art and jewelry collection owned by Plaintiffs’ foundation will be exhibited at the Ducal Palace or the MUVE, Fondazione Musei Civici Venezia museum in Venice, Italy from September 9, 2017 through January 3, 2018 (“Venice Art Exhibit”).

4. Information on the above-referenced art exhibit may be found at:  
<http://palazzoducale.visitmuve.it/it/mostre/mostre-in-corso/tesori-dei-moghul-e-dei-maharaja/2017/03/18151/la-collezione-al-thani/>

5. Prior to the opening of the Venice Art Exhibit, Plaintiff His Highness Al-Thani will be giving a comprehensive written interview for publication and is also being filmed as part of a documentary.

6. On the morning of Friday, September 8, 2017, there will be a full press viewing of the Venice Art Exhibit at the museum.

7. Plaintiffs and the art museum also have several dinners and other events planned during the week leading up to the opening of the Venice Art Exhibit to promote the Venice Art Exhibit.

8. During the press viewing and other events relating to the Venice Art Exhibit, numerous individuals are expected to attend. During those events, there will be information and questions regarding the art collection, as well as the Plaintiffs.

9. During the planning process for the Venice Art Exhibit, Plaintiff's project manager, who is handling the Venice Art Exhibit, found the Defamatory Article published by The Muslim Issue through searching the Google Internet Search Engine.

10. Plaintiffs were informed of others becoming aware of this alarming article via e-mail.

11. Plaintiffs are extremely concerned that others will also find the Defamatory Article once the Venice Art Exhibit opens and the related promotional events occur.

12. Plaintiffs' respective reputations will be irreparably and permanently harmed if the Defamatory Article is discovered and viewed by additional attendees of the Venice Art Exhibit, or any other individuals.

13. The Defamatory Article's attribution of child rape to Plaintiff His Highness Al-Thani is despicable, vile, and wholly false. However, individuals viewing the Defamatory Article

do not have the means to confirm the veracity of the information contained therein, making it particularly harmful to Plaintiff His Highness Al-Thani, as well as Plaintiff QIPCO.

Dated: September 1, 2017

/Richard Hart/  
Richard Hart